

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Kelli Jo Torres,

Case No. 20-cv-1092-DSD-ECW

Plaintiff,

v.

Dallas Hamm; Shelley Douty;
Rock County Sheriff Evan Verbrugge;
Rock County; all individuals being sued
in their individual and official capacities,

**STIPULATION OF DISMISSAL
WITH PREJUDICE OF
DEFENDANTS HAMM, DOUTY
AND VERBRUGGE**

Defendants.

IT IS HEREBY STIPULATED BY AND BETWEEN the undersigned parties that any and all of Plaintiff's claims against Defendants, Dallas Hamm, Shelley Douty and Evan Verbrugge, in either their individual or official capacities, be dismissed with prejudice.

Plaintiff specifically acknowledges this dismissal is voluntarily entered into and that no payment or separate consideration is being paid for entering into this dismissal. Plaintiff and Defendants Dallas Hamm, Shelley Douty and Evan Verbrugge also agree that neither party is entitled to costs, disbursements, or attorney's fees (including attorney's fees pursuant to 42 U.S.C. § 1988).

IT IS FURTHER STIPULATED that, without further notice, a Judgment of Partial Dismissal with Prejudice of any and all of Plaintiff's claims against Defendants Dallas Hamm, Shelley Douty and Evan Verbrugge, without costs or disbursements or attorney's fees may be entered herein

Dated: 8/25/21

**AMERICAN CIVIL LIBERTIES UNION OF
MINNESOTA**

By: s/ Ian Bratlie

Ian Bratlie, #319454
709 South Front Street, Suite 1B
Mankato, MN 56001
Telephone: (651) 645-4097
ibratlie@aclu-mn.org

Teresa Nelson, #269736
P.O. Box 14720
Minneapolis, MN 55414
Telephone: (651) 645-4097
Facsimile: (651) 647-5948
tnelson@aclu-mn.org

Clare Diegel, #0400758
AMERICAN CIVIL LIBERTIES UNION OF MN
P.O. Box 14720
Minneapolis, MN 55414
Tel: (612) 274-7791
Fax: (651) 647-5948
cdiegel@aclu-mn.org

Attorneys for Plaintiff

Dated: 8/25/21

JARDINE, LOGAN & O'BRIEN, P.L.L.P.

By: s/ Joseph E. Flynn

Joseph E. Flynn, #0165712

Vicki A. Hruby, # 0391163

Alexandra A. Meyer, #0398471

8519 Eagle Point Boulevard, Suite 100

Lake Elmo, MN 55042-8624

Telephone: (651) 290-6500

Facsimile: (651) 223-5070

jflynn@jlolaw.com

vhruby@jlolaw.com

ameyer@jlolaw.com

Attorneys for Defendants